

**COMMONWEALTH OF MASSACHUSETTS**

**MASSACHUSETTS**

**DEPARTMENT OF TELECOMMUNICATIONS & ENERGY**

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Petition of Boston Gas Company d/b/a  
KeySpan Energy Delivery New England

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D.T.E. 03-40

**FIRST SET OF INFORMATION REQUESTS OF THE  
MASSACHUSETTS OILHEAT COUNCIL, INC. AND  
THE MASSACHUSETTS ALLIANCE FOR FAIR COMPETITION, INC.**

MOC-1-1: For the years 2003 (to date), 2002, 2001, 2000 and 1999, please provide the following information with regard to the Company's sales promotional expenses:

- (a) the annual level of the Company's sales promotion expenses;
- (b) the amount of expenses recovered through rates; and
- (c) detailed list of the promotional expenses by type - - including, but not limited to, expenses spent on print advertising, TV advertising, radio advertising, contractor incentives, rebates and/or equipment giveaways.

MOC-1-2: Please indicate the anticipated level of the Company's sales promotional expense for this year. In connection with the Company's filing:

- (a) please indicate the amount of sales promotional expense for which the Company is seeking DTE approval to recover through rates; and
- (b) please indicate whether and how the level of promotional expenses will be adjusted from year to year under the Company's proposed filing.

MOC-1-3: For the years 2003 (to date), 2002, 2001, 2000 and 1999, please separately indicate the number of conversions from oil, propane and electricity to the Company's natural gas service for:

- (a) residential customers;
- (b) commercial customers; and
- (c) industrial heating customers.

MOC-1-4: At page 9 of witness Bodanza's testimony, he states that the New England area has a "relatively low saturation rates for gas service". Please explain this statement and provide any backup information and documents with regard thereto.

MOC-1-5: At page 9 of witness Bodanza's testimony, he states:

"KeySpan's expansion of the customer base will benefit all customers in terms of increasing revenues and spreading fixed costs across a larger customer base."

With regard to this statement, please provide the following:

- (a) any study, research or other support for the statement that adding customers to the KeySpan system benefits all customers, both in terms of increased revenues and spreading fixed costs; and
- (b) any study or research performed by or relied upon by the Company to quantitatively demonstrate that such conversions are economical to the Company and/or the ratepayer.

MOC-1-6: For the years 2003 (to date), 2002, 2001, 2000 and 1999, please indicate by residential, commercial and industrial class the number of the Company's:

- (a) firm gas customers;
- (b) interruptible gas customers (and if any temperature-controlled customers exist, please state separately); and
- (c) transportation customers (where the customer purchases gas commodity from a separate marketer or supplier).

- MOC-1-7: For the years 2003 (to date), 2002, 2001, 2000 and 1999, please separately list, giving both amount and purpose, payments received by the Company from its affiliate KeySpan Home Energy Services.
- MOC-1-8: For the years 2003 (to date), 2002, 2001, 2000 and 1999, please separately list, giving both amount and purpose, payments made by the Company to its affiliate KeySpan Home Energy Services.
- MOC-1-9: Does the Company pay any royalties or other compensation for use of the "KeySpan" name to any of its affiliates? If so, please give the amount of compensation for the years 2003 (to date), 2002, 2001, 2000 and 1999.
- MOC-1-10: Does the Company receive any royalties or other compensation for use of the "KeySpan" name from any of its affiliated companies? If so, please give the amount of compensation for the years 2003 (to date), 2002, 2001, 2000 and 1999.
- MOC-1-11: For the years 2003 (to date), 2002, 2001, 2000 and 1999, please set forth the number of customer calls requiring an on-site visit by company personnel. For each year, please indicate whether the call was:
- (a) safety related (*i.e.*, smell of gas or actual incident);
  - (b) no heat calls;
  - (c) pilot lighting calls;
  - (d) appliance service calls; and
  - (e) any other calls (please detail).
- MOC-1-12: For the years 2003 (to date), 2002, 2001, 2000 and 1999, please indicate the number of marketing lead calls that the Company received for natural gas appliance service, installation, repair, maintenance, upgrade, and/or conversions. Please further indicate the Company's projected marketing leads calls for the remainder of the current year.
- MOC-1-13: With regard to marketing leads received by the Company, please provide the Company's policy and practice in assigning leads to itself, to its affiliate(s) and to outside contractors. Please indicate if the Company's policy and practice has been the same since 1999. If not, please indicate any changes.

MOC-1-14: Please describe in detail any and all of the Company's free equipment giveaway programs and provide all promotional material with regard thereto. In addition to describing these programs, please indicate the following:

- (a) the supplier(s)/manufacturer(s) with which KeySpan has contracted to supply the free equipment;
- (b) the number of customers that have qualified for the program for each year of the program's existence;
- (c) the number and type of equipment given away; and
- (d) the total annual amount that the Company has expended on the program during its duration.

Dated: May 30, 2003